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Congress of the United States House of Representatives

November 4, 2002

COMMITTEE ON ARMED SERVICES
SUBCOMMITTEE ON MILITARY INSTALLATIONS
AND FACILITIES
SUBCOMMITTEE ON MILITARY READINESS
OVERSIGHT PANEL ON TERRORISM
COMMITTEE ON VETERANS' AFFAIRS
SUBCOMMITTEE ON HEALTH
CONGRESSIONAL HISPANIC CAUCUS
FIRST VICE CHAIR
CHAIR, HEALTH TASK FORCE

Mr. Walter Peck
AFBCA/DK, Building 43
143 Billy Mitchell BLVD.
San Antonio, Texas 78226

Dear Mr. Peck:

My interest in the environmental issues at and surrounding Kelly USA remains strong, and I believe that we must all strive for a complete clean up of the contamination caused by the former Kelly Air Force Base. I have heard many perspectives on the possible negative impacts on the community's health, environment, properties and quality of life caused by the contamination; whichever is the closest to the truth, one fact remains, the U.S. Air Force has an obligation to clean up the contamination and its effects both at Kelly USA and the surrounding communities.

Having stated this, I also want to recognize the great efforts the Air Force has demonstrated since the discovery of the contamination at the base and neighboring communities, from the numerous open houses held to explain the clean-up process, to providing funding for the Public Center for Environmental Health. These actions have not and do not go unnoticed by me and by the community.

I am submitting the following comments and requests on the Air Force's Draft Final Corrective Measures Study, Zone 4 for your consideration. As I understand it, the **Air Force's Plan** includes the following:

- Monitored natural attenuation;
- Two permeable reactive barriers (PRB);
- Five pump-and-treat vertical wells at high concentration areas; and,
- Existing source control systems.

Let me begin with stating that the Air Force's preferred remediation plan falls dramatically short of the community's expectations, desires and needs. Natural attenuation should not be the major remedial technology for groundwater clean up as other more aggressive technologies exist and should be considered. Such technologies include, but are not limited to, enhanced bioremediation, soil vapor extraction (SVE), thermal treatment, and dual phase extraction.

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I strongly believe that the final Air Force plan must include the following:

1. Ensure that the community stakeholders have an opportunity for meaningful participation in the final decision-making process on the Air Force's Plan

While I understand that the Air Force held several meetings and open houses during the last two years to discuss proposed clean-up plans, I am also aware that the communities neighboring Kelly USA do not feel that they have had an opportunity for meaningful participation in the decision-making process. The concern expressed to me is that the Air Force's efforts to reach out to the neighboring communities have not been genuine, as demonstrated by the process utilized to provide information and solicit input from the community stakeholders. Instead of conducting an open forum for discussion of plans, a more fragmented and confusing open house set up was used whereby attendees would go from table to table speaking individually to Air Force representatives regarding highly technical subjects. Most would have been better served by participating in a group information forum, where persons with more environmental knowledge would ask relevant questions and the rest of the community members could hear the responses provided. A moderated group forum would be more conducive to generating a truly interactive process between the communities and the Air Force.

Hispanic residents also felt that the efforts to reach the Spanish-speaking segment of the community were inadequate and were reluctantly instituted only after receiving complaints from organizations representing them. I also was informed by La Prensa, the largest Spanish language newspaper in San Antonio, that they often were not able to publish the meeting notices in their newspaper due to what seemed to be a lack of forethought by the Air Force in planning the publication of the notices.

I recommend that the Air Force hold at least one additional public meeting. This meeting should be planned with input from the community regarding the most appropriate location and format. At this meeting, the Air Force should be prepared to discuss, in plain English and Spanish, why the proposed plan was selected by the Air Force from the alternative plans considered. The community should be given an opportunity to ask any questions they have regarding the Air Force's plan.

2. Provide funding for the community to hire a technical expert to review the proposed plan

Linked to the community's concern regarding their lack of participation in the decision-making process is their expressed request to have an independent technical consultant

review the Air Force's plan on their behalf. I am aware of other communities that have received grants to hire technical experts to review highly complicated technical plans such as the plan currently proposed by the Air Force.

I recommend that the Air Force provide funds to the community to hire a technical expert to be retained throughout the proposal, design and implementation phases, to include review of the first 5-year review conducted by the Texas Commission on Environmental Quality. After the initial 5-year review, the technical expert should provide an independent comprehensive report to the community regarding whether the clean-up efforts are being successful or if alternative measures need to be considered.

3. **Permeable Reactive Walls**

Alternative F, being considered by the Air Force, provides a limited number of reactive walls which I have been told would not be sufficient to address the high contaminant concentrations in the plumes. **I recommend that the Air Force place at least five additional walls to cover the full perimeter of the plume in the direction in which the plume is propagating toward residential areas.** Where concentrations are highest, pump-and-treat and more aggressive technologies would seem to be more appropriate.

4. **Include Phytoremediation Along the San Antonio River as an Added Clean-up Measure**

I concur with the City of San Antonio's recommendation that some type of phytoremediation (clean up using trees) be considered as part of the strategy to address the contaminated groundwater seepage at the San Antonio River bank. Planting of trees along the river would not only remove any potential groundwater contamination prior to its reaching the San Antonio River, but also add aesthetic benefits to this area. **I recommend that Alternative B's phytoremediation component be included in the clean-up remedy.**

5. **Increase the Number of Pump-and-Treat Vertical Wells**

The Air Force proposes 5 pump-and-treat vertical wells for the entire plume. It is apparent even from the Air Forces's own projections that there will be sections of the plume that will not be addressed at all by the pump-and-treat vertical wells or any of the two permeable reactive walls. **Therefore, I recommend that an additional fifteen pump-and-treat vertical wells be added at strategic areas, specifically those areas that would not be covered by the Air Force's proposal, such as the areas surrounded by the following streets: AREA I - SW Military Drive (southern boundary), Somerset**

(eastern boundary), Southcross (northern boundary) and Quintana Road (western boundary); AREA II - SW Military Drive (northern boundary), Zarzamora Street (western boundary), Flores (eastern boundary) and Gillette (southern boundary); AREA III - Triangle formed by - Quintana Road (western boundary), Southcross (southern boundary) and Pierian Avenue & west fence of East Kelly (eastern boundary).

6. **Conduct a Comprehensive Volatile Organic Compounds (VOC) Assessment**

I recommend that the Air Force expedite accurate, applicable and comprehensive tests on VOCs for the entire plume with an emphasis in the surrounding East Kelly community. (For specifics on this comment please see the Technical Review submitted to the Air Force by Dr. Katherine S. Squibb, PhD., with the University of Maryland, particularly the recommendations on exposure to VOCs in groundwater via intrusion into area homes).

7. **Test for the Inhalation of Volatile Organic Compounds (VOC) & Semi-Volatile Organic Compounds (SVOC)**

It is my understanding that the Air Force did not test for inhalation of PAH by area residents and former Kelly workers. **I recommend that the Air Force assess the possible inhalation of all VOC and SVOC from East Kelly, by area residents and former workers and develop a clean-up plan if inhalation is occurring.** If negative effects from inhalation are found, a comprehensive health care response and compensation system for harm caused to the people who have inhaled any VOC and/or SVOC, including sufficient funding to cover all medical treatment costs, should be established.

8. **Ensure Immediate and Complete Clean Up of all Dense Non-Aqueous Phase Liquids (DNAPL) Lying Over Any Part of the Aquitard**

I have listened to concerns of the danger posed by any pools of DNAPLs lying on the aquitard found over the Edward's Aquifer. As is known, DNAPLs, because of their density, fall to the lowest point within a source of water. If a concentration of any DNAPLs forms, then the danger arises of having these contaminants eat away, chemically degrade, the soil structure of the aquitard, creating a direct pathway to the next layer of sediment. In this case, it could endanger the Edward's Aquifer. Even if the concentration of DNAPLs is low, it is possible for these to traverse through any fissures (cracks) in the aquitard. **Therefore, I strongly recommend that the Air Force identify and remove any pools and any source areas of DNAPLs lying over the mentioned aquitard to protect the Edward's Aquifer.**

9. **Ensure the Latest Technology and Equipment Usage**

I recommend that the Air Force ensure that the latest, proven to work, state of the art technologies, equipment and techniques are used for the clean-up process.

10. **Investigate Possible Source Site Near the DRMO**

I recommend that the Air Force develop and implement a test and a clean-up plan of possible contamination from the DRMO site.

11. **Investigate Possible Contamination of Six Mile Creek**

I recommend that the Air Force develop and implement a test and a clean-up plan of possible contamination of Six Mile Creek.

Last May, I made a similar request to the Air Force for investigations of health risks in the surrounding communities from contamination migrating from the East Kelly portion of the former Kelly Air Force Base. At that time I was advised that Dr. Squibb had expressed similar concerns as part of her review of ATSDR's Public Health Assessment and that she had presented her review to the Kelly Restoration Advisory Board in April. I was informed that the Air Force was evaluating her comments and existing data to determine if there was a need for further investigation and risk assessment.

12. **Provide Funding for an Independent Comprehensive Study of Contaminant Pathways to Humans**

I recommend that the Air Force provide funding for an independent and comprehensive study of former Kelly Air Force Base workers and of residents that live over and near the plume, focusing on the possibility of pathways of the contaminants to people.

13. **Ensure Complete Clean Up**

I feel strongly that the Air Force provide extensive monitoring and public feedback of the clean-up process. Further, the Air Force should provide the independent technical reviewer, hired by the community, access to the monitoring process, to include 24 hour access to the monitoring wells.

Clean up will be considered complete when drinking water standards of the contaminated water are reached, and when the area is rid of the all contaminants caused by the Air Force.

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14. Concern Over the Computerized Model for Predicting Effects of Remedial Actions

According to members of the Restoration Advisory Board, the Committee for Environmental Justice Action and the Southwest Workers' Union, the Air Force relies on a computerized model of predicting the effects of remedial actions. The concern is that the model results were not subjected to a realistic sensitivity analysis, and such analysis should be required before model results are accepted.

I recommend that the Air Force perform a realistic sensitivity analysis and then apply the results to the proposed remedial actions and present it to the public.

15. Provide a Contingency Plan

In an effort to attain assurance that not only will the clean up be a success; but, that the time-lines provided by the Air Force will be maintained, **I recommend:**

- **that the Air Force establish a fund to provide compensation for medical costs in the event that people are determined to be ill from former Kelly Air Force Base contamination;**
- **that the Air Force establish a fund to provide compensation to property owners in the event that there is a loss in property value due to the contamination from the former Kelly Air Force Base (this should include a property buy-out fund); and,**
- **that the Air Force provide a contingency plan to each of the proposed clean up tools in the event this methods fail. For example, if the pump-and-treat wells are not cleaning the plume at the rate predicted, then the Air Force should provide a contingency plan for that particular pump-and-treat well.**

Once again, thank you for the diligent work everyone on your staff has performed and for responding to my recommendations. Please do not hesitate to contact me if you have any questions. Together we can make this an exemplary clean up, not only for the nation, but, for the world, clearing the way for economic development and improved health.

Sincerely,

Ciro D. Rodriguez
Member of Congress